

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 13 1992

In the Matter of:)

)
)
Amendment of Part 61 of the)
Commission's Rules to Require)
Quality of Service Standards)
in Local Exchange Carrier)
Tariffs)

PM-7967
AAD-92-39

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its reply to comments filed on June 22, 1992 in the above-referenced proceeding.¹

Only three parties filed in support of the Joint Petition.² None of these parties provided any information to counter the position taken by USTA and the majority of commenters that the Joint Petition is both substantively and procedurally flawed.

As one commenter stated, a rulemaking would be premature and duplicative of other Commission efforts.³ The majority of commenters agree that the Petition is devoid of any information

¹ Amendment of Part 61 of the Commission's Rules to Require Quality of Service Standards in Local Exchange Carrier Tariffs, Joint Petition for Rulemaking (filed April 6, 1992), Public Notice DA 92-634 (released May 21, 1992). [Joint Petition].

² Independent Data Communications Manufacturers Association (IDCMA), Tele-Communications Association (TCA) and Information Technology Association of America (ITAA).

³ MCI at pp.2-4.

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which would justify initiation of a rulemaking.⁴ This issue was thoroughly debated during consideration of price cap regulation.⁵ The Joint Petition merely repeats arguments made previously. These arguments have been rejected. Neither the Joint Petition nor the comments in support supply the necessary justification to resurrect this issue.

In addition, the Joint Petition is not in the public interest. Large business users are sophisticated enough to examine existing standards contained in present access tariffs as well as the Bellcore Technical References.⁶ Large users have other options. They can utilize competitive alternatives, participate in industry standards-setting bodies and use the Commission's complaint process.⁷ Residential users would not benefit from the proposal contained in the Petition.⁸ Further, commenters agree that the potential burdens on exchange carriers and the Commission outweigh any possible benefit.⁹

IDCMA, although supporting the Joint Petition, emphasizes

⁴ USTA at p.5, MCI at 3, NYNEX at pp.4-5, Rochester at p.5 and Bell Atlantic at p.3.

⁵ USTA at pp.3-5, GTE at p.2, BellSouth at pp.2-4, U S West at pp.2-4 and NYNEX at pp.2-3.

⁶ MCI at p.5, Ameritech at p.6, NYNEX at p.10, SNET at p.3, United at p.2 and BellSouth at p.8.

⁷ NYNEX at pp..11-12, MCI at p.5 and Rochester at p.6.

⁸ MCI at p.5 and Ameritech at p.2.

⁹ USTA at pp.6-7, MCI at pp.5-6, Ameritech at pp.6-7, SNET at pp.2-3, United at p.3, U S West at pp.4-5, Rochester at p.3 and BellSouth at p.7.

the limitations of the proposal by pointing out that interexchange carriers are not included.¹⁰ IDCMA apparently is unaware that the information furnished to the Congress was compiled from Bellcore Technical References that are referred to in the interstate access tariffs and are available to the public.¹¹

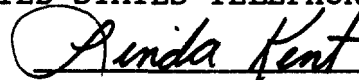
TCA seeks to expand the Joint Petition by increasing the list of standards.¹² Likewise, ITAA proposes that standards be specific for each individual service.¹³ These suggestions would only further increase the burden without conferring any benefit.

The record clearly indicates that exchange carriers are committed to providing high quality service. It does not support the initiation of the rulemaking proposed in the Joint Petition.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

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July 13, 1992

¹⁰ IDCMA at p.5.

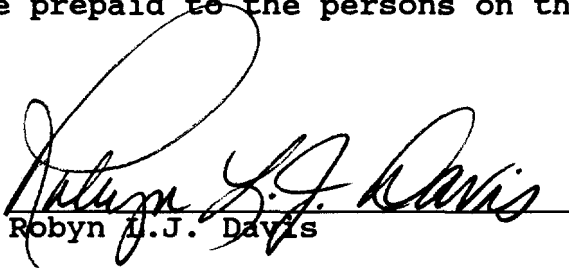
¹¹ See, Bell Atlantic at p.2.

¹² TCA at p.5.

¹³ ITAA at p.4.

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on July 13, 1992
copies of the foregoing Reply Comments of the United States
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